## IN THE UNITED STATES DISTRICT COURT OF THE EASTERN DISTRICT OF TEXAS TEXARKANA DIVISION

HOLLY ANN SACKS, Individually and	§	
as Representative of the Estate of	§	
RICHARD TODD SACKS, MELVIN	§	
PHILLIP SACKS, and MARILYN	§	
PROCTOR,	§	
	§	
Plaintiffs,	§	CIVIL ACTION
	§	NO. 5:04-CV-73
V.	§	
	§	
FOUR SEASONS HOTELS LIMITED	§	
AND FOUR SEASONS PUNTA	§	
MITA, S.A. de C.V.,	§	
	§	
Defendants.	§	

## PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR PROTECTION AND MOTION FOR LEAVE TO EXTEND THE DEADLINES IN THE FOURTH AMENDED SCHEDULING ORDER

Plaintiffs file their Response to Defendants' Motion for Protection and

Motion for Leave to Extend the Deadlines in the Fourth Amended Scheduling

Order, and state as follows:

- 1. Pursuant to the Fourth Amended Scheduling Order, Defendants must show good cause for the Court to grant leave to modify scheduling deadlines.
- 2. Defendants have no good cause to justify any extension of Defendants' deadlines to depose Plaintiffs' expert witnesses Fred Del Marva and Jon Fels or to designate Defendants' rebuttal expert witnesses to these experts.

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